

Mr. Scott Darling
ALCOA Inc. - Warrick Operations
P.O. Box 10
Newburgh, Indiana 47629-0010

Re: Significant Source Modification No:
173-11598-00007

Dear Mr. Darling:

ALCOA Inc. - Warrick Operations applied for a Part 70 operating permit on September 19, 1996 for an aluminum manufacturing plant. An application to modify the source was received on November 24, 1999. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

Four (4) coating mix stations each consisting of two (2) 400 gallon tanks with flat lids. Each of the eight (8) total tanks are vertical fixed roof tanks located inside Building 847 with no control devices.

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Kimberly Titzer or extension (3-8396), or dial (317) 233-8396.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

kt

cc: File - Warrick County
U.S. EPA, Region V
Warrick County Health Department
Southwest Regional Office
Air Compliance Section Inspector - Richard Sekula
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT

ALCOA Inc. - Warrick Operations Junction State Routes 61 & 66 Newburgh, Indiana 47630

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 173-11598-00007	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary aluminum manufacturing facility.

Responsible Official: Mr. Melvin W. Lager, Jr.
Source Address: Junction State Routes 66 and 61, Newburgh, Indiana 47629-0010
Mailing Address: P.O. Box 10, Newburgh, Indiana 47629-0010
Phone Number: 812-853-6111
SIC Code: 3334, 3352
County Location: Warrick
County Status: Attainment for all criteria pollutants, except Unclassifiable for Sulfur Dioxide (SO₂)

Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) Four (4) coating mix stations, identified as Mix Room Stations #7 - #10, each consisting of two (2) 400 gallon tanks with flat lids. Each of the eight (8) total tanks are vertical fixed roof tanks located inside Building 847 with no control devices.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

However, in the event that the Title V application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

- (1) If the Title V draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Title V draft.
- (2) If the Title V permit has gone thru final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go thru a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Title V permit at the time of issuance.

- (3) If the Title V permit has not gone thru final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Title V permit, and the Title V permit will issued after EPA review.

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:
Indiana Department of Environmental Management
Permits Branch, Office of Air Management

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the responsible official as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.4 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.5 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;

- (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this approval;
 - (2) All data, electronic or otherwise, for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.6 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) Unless otherwise specified in this approval, any report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Four (4) coating mix stations each consisting of two (2) 400 gallon tanks with flat lids. Each of the eight (8) total tanks are vertical fixed roof tanks located inside Building 847 with no control devices.

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.1 Reporting Requirements

~~Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels), the Permittee shall maintain a record and submit to the IDEM a one-time report containing the following information:~~

- (1) The vessel identification number.
- (2) The vessel dimensions.
- (3) The vessel capacity.

D.1.2 Record Keeping Requirements

~~Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels), the Permittee shall keep the records required in Condition D.1.1 for the life of the vessel.~~

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name:	ALCOA Inc. - Warrick Operations
Source Address:	Junction State Routes 66 & 61, Newburgh, Indiana 4763
Mailing Address:	P.O. Box 10, Newburgh, Indiana 47629-0010
Source Modification No.:	173-11598-00007

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Significant Source Modification

Source Name:	ALCOA Inc. - Warrick Operations
Source Location:	Junction State Routes 61 & 66, Newburgh, IN
County:	Warrick
SIC Code:	3334, 3352
Operation Permit No.:	T173-6627-00007
Operation Permit Issuance Date:	not issued yet
Significant Source Modification No.:	173-11598-00007
Permit Reviewer:	Kimberly Titzer

On December 23, 1999, the Office of Air Management (OAM) had a notice published in the *Boonville Standard*, Boonville, Indiana, stating that ALCOA Inc. - Warrick Operations had applied for a Construction Permit to operate four (4) coating mix stations. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 7, 2000 and January 20, 2000, ALCOA Inc. - Warrick Operations submitted comments on the proposed Significant Source Modification. The summary of the comments is as follows (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.:

Comment 1: C.4 (Testing Requirements)

This condition seems to stipulate that compliance tests must be conducted within the specified timeframes, etc. Given that the only applicable requirement appears to be to keep records of the tank sizes, I don't see what there is to measure against. Also, the four mix stations covered by this permit vent into Building 847 along with 6 other mix stations (for which a permit is not needed) and all ten are vented out the three stacks listed in the application. There's no way for us to measure the emissions from just those four mix stations. I suggest this condition be rewritten to merely list the requirements when a stack test is required. Language such as this would be acceptable:

C.4 Testing Requirements

- (1) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Smpling Procedures), except as provided elsewhere in this approval, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall notify IDEM, OAM of the actual test date at least two weeks prior to the test date.

- (2) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the Aresponsible official@ as defined by 326 IAC 2-7-1(34).

Response 1: Since there are no testing requirements listed in the D-Section of this permit for the coating mix stations, Condition C.4 (Testing Requirements) may be deleted from the permit. The following change has been made to the permit as follows (all subsequent conditions have been renumbered as a result of the deletion):

Testing Requirements [326 IAC 2-7-6(1)]

C.4 — Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

- ~~(a) — Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.~~

~~A test protocol, except as provided elsewhere in this approval, shall be submitted to:~~

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.~~

- ~~(b) — All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.~~

~~The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Comment 2: The volume of each tank was incorrectly stated in the original application. (ALCOA sent the corrected pages of the application to show the correct volume of the tanks due to having a cone bottom.)

Response 2: The following changes have been made to the permit to change the volume of the tanks from 587 gallons to 400 gallons as follows:

Four (4) coating mix stations each consisting of two (2) **400 587** gallon tanks with flat lids. Each of the eight (8) total tanks are vertical fixed roof tanks located inside Building 847 with no control devices.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) Four (4) coating mix stations, identified as Mix Room Stations #7 - #10, each consisting of two (2) **400 587** gallon tanks with flat lids. Each of the eight (8) total tanks are vertical fixed roof tanks located inside Building 847 with no control devices.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Four (4) coating mix stations each consisting of two (2) **400 587** gallon tanks with flat lids. Each of the eight (8) total tanks are vertical fixed roof tanks located inside Building 847 with no control devices.

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Significant Source Modification

Source Background and Description

Source Name:	ALCOA Inc. - Warrick Operations
Source Location:	Junction State Routes 61 & 66, Newburgh, IN
County:	Warrick
SIC Code:	3334, 3352
Operation Permit No.:	T173-6627-00007
Operation Permit Issuance Date:	not issued yet
Significant Source Modification No.:	173-11598-00007
Permit Reviewer:	Kimberly Titzer

The Office of Air Management (OAM) has reviewed a modification application from ALCOA Inc. - Warrick Operations relating to the construction of the following emission units and pollution control devices:

Four (4) coating mix stations, identified as Mix Room Stations #7 - #10, each consisting of two (2) 587 gallon tanks with flat lids. Each of the eight (8) total tanks are vertical fixed roof tanks located inside Building 847 with no control devices.

History

On November 24, 1999, ALCOA, Inc. - Warrick Operations submitted an application to the OAM requesting to add four coating mix stations to their existing plant. At the time of this review, ALCOA, Inc. - Warrick Operations had not been issued a Title V Operating Permit (T173-6627-00007).

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

The stacks consist of a storage area fan and two exhaust hood fans, identified as 847.1, 847.2 and 847.3.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 24, 1999. Additional information was submitted on December 7, 1999.

Emission Calculations

See the attachments to this document for emissions calculations. Calculations were provided by the source and based on previous stack testing results.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0
PM-10	0
SO ₂	0
VOC	16.64
CO	0
NO _x	0

HAP's	Potential To Emit (tons/year)
<i>Methyl Ethyl Ketone(worst-case)</i>	16.64
TOTAL	16.64

Justification for Modification

Although volatile organic compounds (VOC) are less than twenty-five (25) tons per year, since a single HAP is greater than ten (10) tons per year, a Part 70 Significant Source Modification will be issued pursuant to 326 IAC 2-7-10.5(f)(6).

This Significant Source Modification is the approval for the source to construct and operate the eight (8) coating mix station tanks.

County Attainment Status

The source is located in Warrick County.

Pollutant	Status
PM-10	attainment
SO ₂	unclassifiable
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Warrick County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Warrick County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) does not apply to the eight (8) tanks listed in this TSD, because the tank capacities are less than the applicable threshold of 75 cubic meters (m³)[19,812 gallons].
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels), stationary vessels with a capacity less than thirty-nine thousand (39,000) gallons are subject to the reporting and record keeping provisions and are exempt from all other provisions of this rule.

Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels), the Permittee shall keep records required by this section for three (3) years unless specified otherwise. Records required by the following shall be maintained for the life of the vessel:

The Permittee shall maintain a record and submit to the IDEM a report containing the following information:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance

Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

1. Pursuant to 8-9-1, the four (4) coating mix stations are not applicable to compliance monitoring conditions listed in the rule.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 173-11598-00007.